

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

ALIANZA AMERICAS, YANET DOE, PABLO DOE, and JESUS DOE, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

RONALD D. DESANTIS, Governor of Florida, in his official and personal capacities; JARED W. PERDUE, Secretary of the Florida Department of Transportation, in his official and personal capacities; LAWRENCE A. KEEFE, Florida Public Safety Czar, in his official and personal capacities; JAMES UTHMEIER, Chief of Staff to Florida Governor, in his official and personal capacities; STATE OF FLORIDA; THE FLORIDA DEPARTMENT OF TRANSPORTATION; JAMES MONTGOMERIE; PERLA HUERTA; and VERTOL SYSTEMS COMPANY, INC.,

Defendants.

Civil Action No. 1:22-cv-11550-ADB

**ASSENTED-TO JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO
FEBRUARY 28**

Defendants State of Florida, Florida Department of Transportation, Governor Ronald D. DeSantis, Secretary of Transportation Jared W. Perdue, Lawrence A. Keefe, James Uthmeier, James Montgomerie, Perla Huerta, and Vertol Systems Company, Inc. (collectively, “Defendants”) move this Court for an extension of time to respond to Plaintiffs’ First Amended Complaint to February 28, 2023. *See* Fed. R. Civ. P. 6(b).

1. Plaintiffs filed this lawsuit on September 20, 2022. *See* Doc. 1. Plaintiffs did not serve the initial complaint on any Defendants. On November 29, Plaintiffs filed an 86-page First Amended Complaint that added new defendants and claims. *See* Doc. 21. Plaintiffs began serving the First Amended Complaint on Defendants on December 7, 2022.

2. On December 22, 2022, the State Defendants, Vertol Systems Company, Inc., and James Montgomerie filed assented-to motions to extend the time to respond to January 31, 2023. That same day this Court granted the motions. *See* Doc. 29.

3. Good cause exists for an extension of the January 31, 2023 deadline. As the First Amended Complaint shows, this case presents a complicated range of allegations, legal issues, and parties. Defendants seek additional time to research and investigate the claims raised in the First Amended Complaint as well as potential defenses before answering, moving, or otherwise responding to the pleading. In addition, several defendants have recently retained new counsel who will need additional time to review and analyze those issues.

4. The requested extension will also allow Defendants to coordinate among themselves to try to streamline the briefing and motions practice before this Court as much as possible.

5. For these reasons, there is good cause to grant an extension until February 28, 2023, for all Defendants to respond to the First Amended Complaint.

6. Plaintiffs assent to this request.

WHEREFORE, Defendants request an extension until February 28, 2023, to file their responses the First Amended Complaint.

Dated: January 25, 2023

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Respectfully submitted,

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CERTIFICATE OF CONFERENCE

In accordance with Local Rule 7.1(a), I hereby certify that counsel for Defendants conferred and attempted in good faith to resolve or narrow the issues set forth in this motion with Plaintiffs' counsel, including via telephone and e-mail.

/s/ Bryan Weir

CERTIFICATE OF SERVICE

I hereby certify that I filed this document through the Court's ECF system on January 25, 2023, which will therefore automatically be sent electronically to all counsel of record via the CM/ECF system.

/s/ Bryan Weir